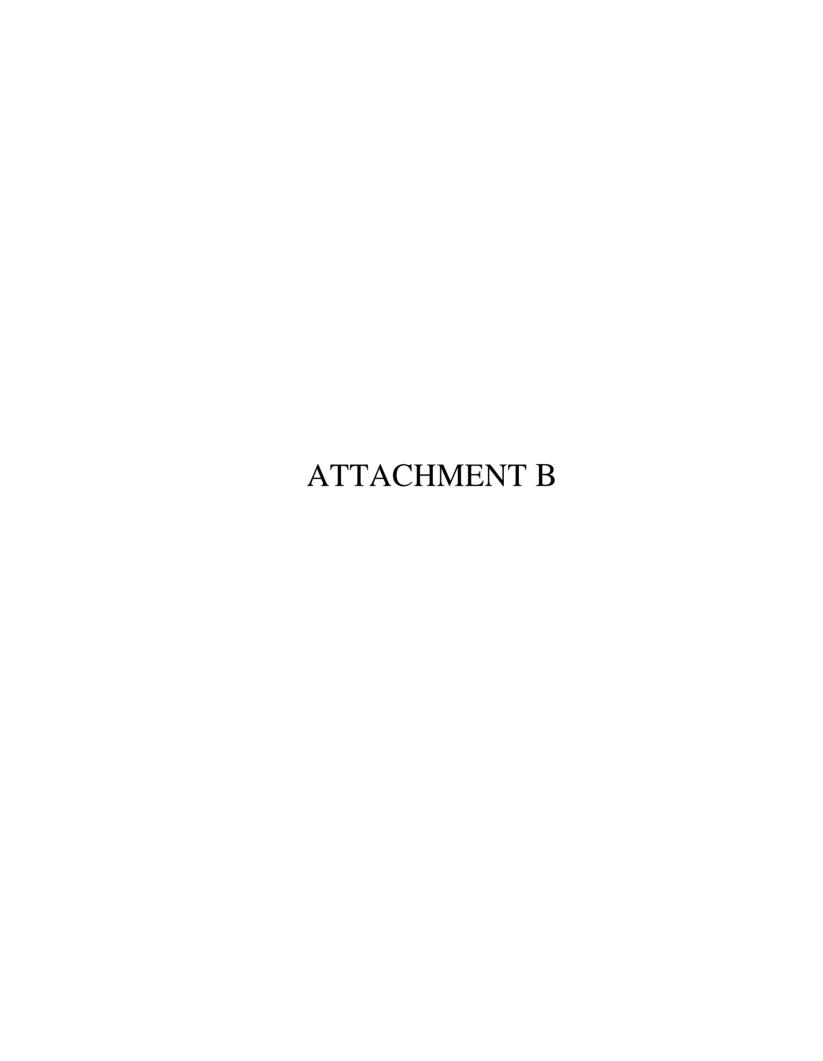# BellSouth Minority Opinion to the Wireless/Wireline Integration Task Report on Number Portability

BellSouth does _not_ support the changes **made by NANC** to the Wireline/Wireless Integration Task Report and regretfully requests that the name of BellSouth be removed as a contributor to the report. BellSouth actively and willingly participated in the preparation of the initial Wireline/Wireless Task Force Report and generally supported the report as _originally submitted_ to the LNPA Working Group   The initial report recommended that wireline carriers review the time intervals required for porting. The initial report also recognized that sufficient data for wireline carriers to perform a proper analysis of the porting intervals would not be available until 4'' quarter. 1998 and that proper analysis of the data could not be completed until after 4th quarter, 1998   In the initial report, a detailed plan and associated timeframes for which this analysis was to be completed was described   However, on a conference call during the week of May 11, 1998, NANC, without concurrence by the task force that prepared the report, agreed to remove this information from the report and alter the completion date of the analysis.

BellSouth fully supports a detailed analysis of the porting intervals to determine if a reduction in those time intervals is possible and is committed to performing such an analysis. However, BellSouth cannot support the changes made by NANC.   The changes made by NANC to _the_ initial report are, in BellSouth's view, fundamental in nature and alter dramatically the content of the initial report. In addition, the alterations to the report were not approved or discussed by members of _the_ WWITF.

BellSouth believes that industry and workgroup reports submitted to NANC should not be modified in any fashion.   Such reports are the collective effort of many parties, some who do not have membership on NANC.   If the NANC does not agree with or endorse such reports, NANC should: 1.) return the report to the committee or working group for reconsideration or, 2) submit the report _unaltered_ and, under a separate attachment, summarize NANC's concern or disagreement with the report. To do otherwise, undermines, for the sake of urgency, the integrity of the work effort that went into the preparation of the report. It is for this reason that BellSouth requests that its name be removed from the report.

ATTACHMENT B

November 4, 1999

Lawrence C. Strickling
Chief. Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street. S.W.
Washington. DC 20554

Re: *Second Report on Wireline Wireless Integration.* In the Matter of Telephone
Number Portability. *Second Report and Order and Further Notice of Proposed
Rulemaking,* CC Docket 95-116

Mr. Strickling:

Enclosed is a copy of the North American Numbering Council (NANC) Local Number
Portability Administration. *Second Report on Wireless/Wireline Integration* provided to
the NANC by the Local Number Portability Administration Working Group. The report
was submitted to NANC in July 1999, and adopted by the Council at its August 24-25.
1999 meeting   Due to an administrative oversight the report was not forwarded to the
Common Carrier Bureau immediately following the close of the August meeting.

As you may recall. the NANC provided the Bureau with an initial report[1] on May 18.
1998. which stated that a subsequent and final report addressing reduction in porting
intervals from wireline to wireless carriers. and the impacts of LNP on resellers would be
forthcoming sometime after December 31. 1998. This report provides three alternatives
to the current porting process.

The *Second Report* **was** intended to be the final report   However. there were concerns
expressed regarding the possible increase in opportunity for slamming, and EYI 1 issues.
In light of such concerns, it was the decision of the NANC to submit the instant report to
the Bureau with the stipulation that a *Third Report* would be provided addressing the
those issues. The LNPA Working Group has committed to deliver the *Third Report* by
end of second quarter, 2000.

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[1] *See* Public Notice DA 98-1290 (rel. Jun. 29, 1998) seeking comment on the North American Numbering
Council recommendation concerning Local Number Portability Administration Wireline and Wireless
Integration, CC Docket 95-116, NSD File No. L-98-84. Comments due by August 18, 1998 and Reply
comments by August 31, 1998.

Additionally. the *Third Report* will also include a description of the new Problem Identification Management Process (PIM) established by the LNPA Working Group to address industry-porting problems.

Sincerely.

John R. Hoffman
Chairman
North American Numbering Council

Cc: Yog Varma. Blaise Scinto. David Furth. Diane Harmon. Jared Carlson
        Jeannie Grimes

February 5. 1999

North American Numbering Council

LNPA Working Group 2nd Report
on Wireless Wireline Integration

LNPA Working Group 2nd Report
on Wireless Wireline Integration

North American Numbering Council

Local Number Portability Administration Working Group

2nd Report on Wireless Wireline Integration

June 30, 1999

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February 1, 1999

LNPA Working Group 2nd Report
on Wireless Wireline Integration

North American Numbering Council

LNPA Working Group 2nd Report
on Wireless Wireline Integration

1. Executive Summary

The LNPA Working Group (LNPA WG) has prepared the 2nd Report on Wireless Wireline Integration to address the open issues that were identified in the initial integration report submitted to the FCC on May 18, 1998.

In the First Report and Order, the Commission established rules mandating number portability for both LECs and CMRS providers. A separate timetable was established for CMRS providers, requiring them to implement Service Provider number portability by June 30. 1999. The Wireless Telecommunications Bureau, acting on delegated authority. issued a Memorandum Opinion and Order (Order) granting a petition filed by the Cellular Telecommunications Industry Association (CTIA). The petition requested a nine-month stay of the requirement that all cellular, broadband personal communications service (PCS). and covered specialized mobile radio (SMR) carriers provide Service Provider number portability by June 30. 1999. changing the mandatory wireless implementation dare to March 31, 2000. Subsequently, the FCC issued a further extension of the wireless portability implementation until November 24, 2002. This further extension does not alter the LNPA Working Group's scheduled 6/30/99 delivery of its porting interval recommendations. All regulatory considerations of this report specifically apply to the US environment. The Canadian Radio and Telecommunications Commission (CRTC) has not to date mandated wireless portability. Some of the operutional and process data is specific to the US environment. Operational issues relating to roaming between Canadian and US networks need to be addressed.

1.1 Report Recommendations

This report continues to address the integration of wireline and covered CMRS provider number portability issues. The following list summarizes the recommendations made by the LNPA WG and its subcommittees. Plcasc see the individual sections for a more detailed analysis of the issues.

1. **Inter-Service Provider LNP Operations Flows.** The Inter-Service Provider LNP Operations Flows have been modified to incorporate the LNP Operations of the wireless industry segment. *The LNPA Working Group recommends adoption of the modified flows (Appendix C, Figure 1 through 9) in place of those flows currently in use for LNP.*

2. **LSR/FOC Processing Interval.** To date, experience has shown that the LSR/FOC process between wireline Service Providers. requires *at least* the one-day interval, whether electronic or manual interfaces are employed., *the service providers participating in the analysis believe that it is not yet possible to shorten the LSR/FOC processing interval, and recommend that the 24-hour interval he applicable fur all ports including ports to wireless providers.*

3. **The Porting Interval Alternatives.** Due to the difference of timeframes involved in the establishment of service between wireline and wireless providers, the LNPA Working Group recommends that the following alternatives be thoroughly developed and investigated in an effort to find mutually acceptable variations that may improve the porting interval in some circumstances.

Alternative 1:

By negotiation between individual Service Providers, the potential exists to reduce the porting interval by allowing the new Service Provider to activate the port at the NPAC as soon as the 10-digit trigger¹ has been applied by the old Service Provider, if "mixed service"² from both the wireline and the wireless providers is acceptable until the disconnect process can be completed.

Alternative 2:

It may be acceptable to perform the new SP NPAC activation of the port immediately following the receipt of the FOC by the new service provider and concurrence at the NPAC by the old SP, if "mixed service" from both the wireline and the wireless providers is acceptable until the disconnect process can be completed.

Alternative 3:

If the Service Providers involved agree, it may be acceptable for the new Service Provider to perform the NPAC creation and activation of the port immediately following the receipt of the notification of the old SP create from the NPAC. If the old Service Provider is in agreement with the LSR, then the old SP indicates authorization to proceed with the port by issuing an old SP create with the authorization flag set to true. The new SP may rely on the NPAC notification in lieu of an FOC. This results in a "mixed service" situation from both the wireline and the wireless providers simultaneously until the disconnect process can be completed.

4. **Integrated LSR Forms.** The LNPA Working Group, as a result of the efforts of the CTIA Inter-Service Provider Sub-committee, and subsequently the WWISC, recommends an integration of wireless requirements into the existing wireline LSR process. Relevant data elements that could be populated within the four LSR forms, by wireless Service Providers, for all port scenarios, have been identified.

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¹ The unconditional ten-digit trigger is an option assigned to a line on a donor switch during the transition period when the line is physically moved from donor switch to recipient switch. During this period it is possible for the TN/MDN to reside in both donor and recipient switches at the same time.

² Mixed service refers to calls that can be originated from both the new wireless phone and the old wireline phone. There are two forms of mixed service: Before NPAC activation, when all calls terminate to the wireline phone, and after NPAC activation when most calls terminate to the wireless phone. The mixed service period ends when the wireline phone is disconnected.

5. **Operational Issues.**

a) Holidays

The LNPA Working Group recommends the following Holidays be observed in the NPAC/SMS:

- New Years Day, Jan 1
- Martin Luther King Day. Third Monday in January
- President's Day, Third Monday in February
- Memorial Day, Last Monday in May
- Independence Day. July 4th
- Labor Day, First Monday in September
- Columbus Day, Second Monday in October
- Thanksgiving Day (US). Last Thursday in November
- Day after 'Thanksgiving **(US).**Day after Thanksgiving
- Christmas Eve, December 24th
- Christmas Day. December 25th

b) Business Days and **Hours of Operation**

Wireless Number Portability will include new hours of operations for wireless carriers to reflect their business model and incorporate the hours of their retail operations. The LNPA Working Group recommends adoption of these business hours for wireless LNP operations (with local time to be determined by region).

	Wireline	**Wireless'**
Sunday		
Monday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Tuesday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Wednesday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Thursday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Friday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Saturday		8 or 9 sm 12 hr duration

[*] Local time to be determined by region

6. **Coordination of Complex Ports.** The LNPA Working Group recommends that guidelines for identification and coordination of Complex Ports as defined in Section

5 of this report be adopted lor use by the industry when circumstances warrant.

7. **Treatment of Type 1 Numbers.** Agreement was reached on the treatment of Type 1 NPA-NXXs. Wireless camers may request that the wireline switch and NPA NXX code is number portability capable. Wireless carriers may port the assigned and reserved Type I numbers to their MSC. The wireless carrier then may terminate their old Type I interconnection contract with the ILEC.

1.2 E911 Process Considerations

The FCC Report and Order 96-264 (also commonly known as FCC Docket 94-102) mandates the delivery of a wireless 9-1-1 caller's callback and location information to the Public Safety Answenng Point (PSAP). Because implementation of number portability affects the routing of a call from emergency services to the callback number, wireless Service Providers need to be aware of the interaction of 911 service and number porting. See Section 5.3 for examples of situations that may occur.

1.3 Contents of the Report

The Introduction in Section 2 discusses the purpose of the 2nd Report on Wireless Wireline Integration.

Section 3 provides information on porting intervals when porting from wireline to wireless carriers and provides a workplan for developing porting procedures when porting from wireline to wireless.

Section *3* discusses Operational issues including Holidays, Business Days and Hours of Operation. NPAC Timers. and wireless integration of the LSR/FOC process.

Section *5* contains other integration issues that were identified and discussed at the LNPA WG and recommendations to the industry. This section includes a discussion of coordination of Complex Pons. treatment of Type 1 numbers, 911 issues, and first port.

Section 6 identifies open issues that are still under analysis.

Section 7 contains definitions of the terms used in the report.

Appendix A contains a list of the LNPA Working Members.

Appendix **B** contains the LNPA Working Group and Task Force meeting schedule.

Appendix C contains the revised. integrated Inter-Service Provider LNP Operations Flows and their narrative descriptions.

February 5, 1999

North Amerirdn Numbering Council

LNPA Working Group 2ⁿᵈ Report
on Wireless Wireline Integration

LNPA Working Group 2ⁿᵈ Report
on Wireless Wireline Integration

2. Introduction

The LNPA Selection Working Group Report outlined seven (7) areas relating to future LNP implementation activities. including integration of wireless in LNP. This was necessary as the original report was developed from a wireline perspective. In June 1997 the LNPA Working Group established a subgroup to develop a work plan for accomplishing the integration of wireless inro LNP, as well as to address several other of the areas defined in the Future Roles section of the report. This activity lead to the formation of the Wireline/ Wireless Integration Task Force (WWITF). As a result of the restructuring of the LNPA WG in July of 1998, the WWITF was renamed to the Wireless Wireline Integration Sub-Committee (WWISC).

2.1 Charter of the WWISC

The WWISC. open to all parties representing all segments of the telecommunications industry, was chartered to make recommendations on the following areas from the FCC's Second Report and Order:

1. Recommend modifications to the NANC Functional Requirements Specification (FRS). which defines the requirements for the Number Portability Administration Center Service Management System (NPAC/SMS), as necessary. to support wireless number portability'.

2. Recommend modifications to the NANC NPAC SMS Interoperable Interface Specification (IIS), which defines the requirements for the mechanized interfaces with the NPAC/SMS, as necessary, to support wireless number portability[4].

3. Monitor industry efforts to develop technical solutions for implementing wireless number portability[5].

4. Develop wireless recommendations to the FCC no later than nine (9) months after release of the Second Report and Order (i.e., May 18, 1998)[6].

The WWISC subcommittee has now been incorporated into the LNPA WG and no longer exists as a separate entity.

2.2 LNPA WG 2ⁿᵈ Report on Wireless Wireline Integration

On May 18, 1998 the LNPA WG presented NANC with the First LNPA WG Report on Wireless Wireline Integration. During the presentation, the NANC instructed the LNPA WG to continue to review sysrems and work processes during the remainder of 1998, in

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[3] Second Report and Order in CC Docket No. 95-166, ¶ 61

[4] Id Al ¶ 64

[5] Id At ¶ 92.

[6] Id Al ¶ 91

order io determine *if* the porting intervals could be reduced when porting from wireline to wireless carriers. At that time, the NANC also requested the LNPA WG io give monthly status reports to the NANC and to provide the recommendations no Inter than December 31. 1998. The recommendations are presented in this second report, but open issues still remain.

The report includes an analysis of current porting intervals and processes used by the wireline carriers. This report incorporates the wireless provisioning processes and procedures into the current NANC Inter-Service Provider LNP Operations Flows. The report also addresses operational issues for wireless porting that have been discussed by the WWISC.

3. Wireline to Wireless Porting Intervals

3.1 Revised NANC Flows

Please see Appendix C for the integrated NANC Inter-Service Provider LNP Operations Flows.

3.2 Study Recommendation Timeframe

In the first report of the LNPA Working Group on Wireless Wireline Integration. the members of the working group recommended that before a determination to shorten porting intervals could he considered. an analysis be performed to evaluate the impacts of actual porting experience on systems and work processes effected by proposed shortened porting intervals. It was deemed necessary to gather sufficient porting dara to complete this analysis. However. since porting volumes had been minimal and porting delayed in cenain MSAs. a number of wireline Service Providers would not gain significant porting experience before rhe end of 1998. resulting in a delay in completing an analysis. Therefore, the members *of* the working group requested that a period of analysis be undertaken that was intended to support the development of l recommendations by June 30, 1999 on porting intervals when porting from a wireline provider to a wireless provider. Subsequently, the NANC requested that every effon be made to prepare the recommendations by December 31, 1998. Additionally, the NANC reserved the right to review these timeframes with any changes in the wireless number ponability implementarion date.

As a result of the initial extension of the wireless portability implementation until March 31, 2000. the LNPA Working Group requested that NANC support the Working Group's recommendation to perform further analysis before making its recornmendations on porting Intervals by June 30, 1999.

3.3 The Wireline to Wireless Porting Process

For ports from wireline providers to wireless, wireless Service Providers desire reduced

porting intervals from those currently used by the wireline segment of the industry. The current porting intervals for wireline include a maximum of one (1) day for the LSR/FOC process and three (3) days for the porting process. Wireline pons may be accomplished in less time when conditions are optimal. however, the timeframes were established to support the complex systems and work processes of all the wireline Service Providers. A variety of systems are used during the porting process including, bur not limited to the following:

- LSR/FOC Systems – *Processing of inter-Service* **Provider** *communication documents*

- Service Order Systems – *Initiate the service orders for Service Provider provisioning and to begin the porting process*

- Inventory Systems – *Manage the distribution and assignment of equipment and telephone numbers*

- Work Force Assignment Systems – *Schedule assignments to accomplish any facilities work*

- Billing Systems – *Update records required ID ensure accurate billing*

- Maintenance Systems – *Update records required to enable quality trouble resolution*

- Switch Administration Systems – *Maintain switch translations and activate optional ten-digit triggers*

- E911 Systems – *Update records to ensure accurate customer data*

The above systems were individually designed and developed by each wireline Service Provider. Many of these systems operate in hatch environments that require at least an overnight timeframe to process updates. Porting intervals were negotiated during 1996 and 1997 by the wireline industry segment to allow for differences in processing parameters of these various carriers' systems.

The one (1) day LSR/FOC process and the thiee (3) day porting interval were negotiated by the wireline camers in order to perform all of the system updates and any physical work required to accomplish the port, For example. the batch service order process used by many wireline carriers results in the need tor the one (I) day LSR/FOC process. During the three (3) day porting timeframe, a batch process is used by many Service Providers to complete the translations work needed to activate the ten-digit trigger in order to enable routing calls to ported customers, and subsequently, to disconnect the porting customer.

3.4 Wireless to Wireless Porting Requirements

The expectation of wireless customers is that they can leave a wireless point of sale with a fully functional handset i.e. the ability to make and receive calls. The wireless industry's customer acquisition and provisioning systems are geared to meet this expectation with remote access network provisioning systems and Over the Air Activation. These systems can provide a functional service in one half hour, or less. To

satisfy the current wireless business model and to meet wireless customer expectations. Wireless providers require shorter porting intervals and an LSR/FOC process that supports the technological advancements of wireless service.

3.5 Wireline Porting Experience

To date, experience has shown that the LSR/FOC process between wireline carriers requires *at least* the one-day interval. whether manual or electronic interfaces are employed. *Thus, the wireline Service Providers participating in the analysis believe that it is not yet possible to shorten the LSWFOC processing interval, and require that the 24-hour interval he applicable for all ports including ports to wireless providers*

The remaining three-day porting process includes the issuance of service orders needed to apply the optional ten-digit trigger and to disconnect service. Although a single porting process flow is desired and extremely important to ensure fair and equitable competition. the many processing systems employed by wireline Service Providers to perform these functions operate in various timeframes and sequences. Thus, there may be some oppoitunity to define alternative means of achieving a reduced porting interval under some circumstances.

3.6 The Study to Assess the Inter-Service Provider Porting Interval

Wireline Service Providers recommend that the following alternatives, as well as any others that emerge during the study, be thoroughly developed and investigated with wireless Service Providers in an effort to find mutually acceptable variations that may improve the post-FOC porting interval in some circumstances.

There are two flavors of mixed service. The first occurs when the cellular phone is activated prior to NPAC Activation. Wireless and wireline phones can both originate calls, but in general, calls terminate to the wireline phone. The second occurs after NPAC activation but prior to the wireline disconnect, when both the wireless and wireline phones can onginate calls, but in general, calls will terminate only at the wireless phone.

Alternative 1:

By negotiation between individual Service Providers, the potential exists to reduce the porting interval by allowing the new Service Provider to activate the port ut the NPAC us soon as the 10-digit trigger' has been applied by the old Service Provider, if "mixed service from both the wireline and the wireless providers is acceptable until the disconnect process can he completed.

Alternative 2:

'The unconditional ten-digit trigger is an option assigned to a line on a donor switch during the transition period when the line is pnyslcally moved from donor switch to recipient Switch During this period it is possible for the TN/MDN lo reside in both donor and recipient switches at the same time

It may be acceptable to perform the new SP NPAC activation of the port immediately following receipt of the FOC by the new Service Provider and concurrence at the NPAC by the old SP, if "mixed service" from both the wireline and the wireless providers is acceptable until the disconnect process can be completed.

Alternative 3:

If the Service Providers involved agree, it may be acceptable for the new Service Provider to perform the NPAC creation and activation of the port immediately following the receipt of the notification of the old SP create from the NPAC. If the old Service Provider is in agreement with the LSR, then the old SP indicates authorization to proceed with the port by issuing an old SP create with the authorization flag set to true. The new SP may rely on the NPAC notification in lieu of an FOC. This results in a "mixed service" situation from both the wireline and the wireless providers simultaneously until the disconnect process can be completed.

Note: Please see Section 5.3 for issues dealing with E911.

3.7 The Work Plan

The LNPA Working Group developed the following work plan to accomplish the investigation of the alternatives suggested, and the preparation of the recommendations on any reduction of the current porting intervals.

- January through May 1999 - Develop alternative proposals and identify the feasibility of application in specific porting circumstances.

  - At February LNPA WG meeting, discuss Alternatives
  - Investigate ramifications on SP processes
  - At March through May meetings, determine the usefulness of Alternatives in light of SP findings, and if appropriate, develop implementation procedures
  - Provide monthly reports to NANC

- May through June 1999 - Develop recommendations and procedures for porting intervals. Submit report on Wireless Wireline Integration to NANC by June 30, 1999.

3.7.1 Proposed Methods of Invoking Alternative 1, 2, or 3 when Porting from Wireline to Wireless

1. Procedure to follow in the event Alternative 1 is invoked:

Alternative 1:

By negotiation between individual Service Providers, the potential exists to reduce the porting interval by allowing the new Service Provider to activate the port at the NPAC as soon as the 10-digit trigger has been applied by the old Service Provider, if "mixed service from both the wireline and the wireless providers is acceptable until the disconnect process can be completed.

<u>Service Provider Agreement prior to Porting</u>

- New SP should notify old SP with whom it intends to invoke the expedited process for ports from wireline to wireless.

- Old SPs who accept this alternative will agree to the invocation of the alternative process.

<u>Alternative Porting Process Steps</u>

- New SP follows the integrated provisioning process flow (Appendix C. Figure 1) including submission of an LSR to the old SP which requests a due date at least three days following receipt of the FOC (Step 6).

- By agreement between the old SP and the new SP. the old SP will take the actions necessary to provision the IO-digit forced query trigger after sending the FOC. Timing for activation of the trigger will vary depending on the old SP provisioning systems. Some are batch processes: others are closer to real time. The agreement should specify the means for the new SP to know when the 10-digit trigger is applied.

- If the following events have occurred, the new SP may submit a change of due date modification to the pending NPAC port to advance the Due Date (usually to the current day):

    1. New SP has received the FOC, which *confirms the request** (Step 7).

    2. New SP has sent a create subscription to the NPAC.

    3. New SP has received a notice from the NPAC that **the** old SP subscription with the authorization flag set to true was received.

4. IO-digit forced trigger is provisioned. (The IO-digit trigger must be in place for all incoming calls to be routed to the new SP.)

- New SP may then immediately submit an activation action to the NPAC on the modified due date.

- Old SP completes its processes as soon as possible. but not later than the original due date.

"If the FOC indicates any difference with the requested LSR, it must be resolved before the expedited process may be invoked.

II. Procedure to follow in the event Alternative 2 is invoked:

Alternative 2:

It may be acceptable to perform the new SP NPAC activation of the port immediately following receipt of the FOC by the new Service Provider and concurrence at the NPAC by the old SP, if "mixed service" from both the wireline and the wireless providers is acceptable until the disconnect process can be completed.

Service Provider Agreement prior to Porting

- New SP should notify old SP with whom it intends to invoke the expedited process for ports from wireline to wireless.

- Old SPs who accept this alternative will agree to the invocation of the alternative process.

Alternative Porting Process Steps

- New SP follows the integrated provisioning process flow (See Appendix C. Figure 1) including submission of an LSR to the old SP which requests a due date at least three days following receipt of the FOC (Step 6).

- If *after* the FOC which *confirms the request** is received by the new SP (Step 7), a notice is received from the NPAC that the old SP subscription with the authorization flag set to true has been received. then the new SP may submit a change of due date modification to the pending NPAC pon (usually to advance the Due Date to *today*).

- New SP may then immediately submit an activation action to the NPAC on the modified due date.

- Old SP completes its processes as soon as possible, but not later than the original due date.

*If the FOC indicates any difference with the requested LSR. it must be resolved before the expedited process may be invoked.

III. Procedure to follow *in the event Alternative 3* is *invoked:*

Alternative 3:
If the Service Providers involved agree. it may be acceptable for the new Service Provider to perform the NPAC creation and activation of the port immediately following the receipt of the notification of the old SP create from the NPAC. If the old Service Provider is in agreement with the LSR, then the old SP indicates authorization to proceed with the port by issuing an old SP create with the authorization flag set to true. The new SP may rely on the NPAC notification in lieu of an FOC. This results in a "mixed service" situation from both the wireline and the wireless providers until the disconnect process can be completed.

Service Provider Agreement prior to Porting

- New SP should notify any SP with whom it intends to invoke the expedited process for ports from wireline to wireless.

- Old SPs who accept this alternative will agree to the invocation of the alternative process.

Alternative Porting Process Steps

- New SP follows the integrated provisioning process flow (See Appendix C Figure 1) including submission of an LSR to the old SP which requests a due date at least three days following receipt of the FOC (Step 6)".

- When a notice is received from the NPAC that the old SP subscription with the authorization flag set to true has been received. then the new SP may submit a change of due date modification to the pendinp NPAC port (usually to advance the Due Date to *today*).

- New SP may then immediately submit an activation action to the NPAC on the modified due date.

- Old SP completes its processes as soon as possible. but not later than the original due dare.

"If the old SP disputes any information on the LSR, it must be resolved before the expedited process may be invoked.

4. Operational Issues

1.1 Inter-Service Provider Communication

4.1.1 CTlA Wireless LNP Workshop Results

The CTlA sponsored a number of Subject Matter Expert Workshops that mer from August 1997 until February 1998. During one of these workshops, a subcommittee was formed to evaluate the wireline process of inter-Service Provider communications as related to Local Number Portability (LNP). As a result of the discussions in that sub-committee, wireless carriers adopted the same means of communication currently used by wireline carriers for LNP. namely, the Local Service Request (LSR) process as an interim solution. The participating carriers further agreed to undertake a feasibility study to eliminate the LSR process while porting between wireless carriers.

4.1.2 LSR Process

The LSR process for Number Portability includes the use of the following forms (data structures) currently in use by wireline camers:

- Local Service Request (LSR).

- End User Information (EUl),

- Number Portability (NP)

- Local Service Request Confirmation (LSC), also known as the Firm Order Confirmation (FOC).

All guidelines for these forms are maintained by the ATIS sponsored Ordering and Billing Forum (OBF).

4.1.2.1 Local Service Request (LSR)

The LSR form contains four sections:

- Administrative Section shows a purchase order number. identifies the originating company by means of a carrier name abbreviation, gives information regarding the date and time of the completion of the form and the requested service change, the type of request, and gives the name of the person who authorized the request;

- Bill Section shows details regarding the customer's current billing information:

- Contact Section shows information regarding the person/company requesting the service change;

- Remarks Section is a free-form portion of the LSR where additional information can be included.

4.1.2.2 End User Information (EUl)

The EUI form contains six sections:

- Administrative Section contains a purchase order number (same as the PO number on the LSR). and an account number and account telephone number;

- Location and Access Section gives information regarding the location and name and address of the end user;

- Inside Wire Section gives information regarding billing for inside wire provision and maintenance:

- Bill Section gives billing name and address information specific to the location identified in the second section:

- Disconnect Information Section gives information such as the telephone number and whether or not any of the lines are to be transferred to another number when they arc disconnected:

- Remarks Section provides a frec-form section for any additional information.

4.1.2.3 Number Portability (NP)

The NP form contains three sections:

- Administiative Section, like the EUI form, contains a purchase order number and an account number and account telephone number in addition to the number of lines that are included in the port:

- Service Derails Section contains information regarding each line that is being ported such as the line number relative to the total number of lines, the directory number of the line being ported. and the Location Routing Number assigned to the potted number:

- Remarks Section provides a free-form section for any additional information.

4.1.2.4 Local Service Confirmation (LSC)

The LSC form contains seven sections:

- Administrative Scction contains the same information as the Administrative section of the EUI form plus an LSR number used in tracking, the date and time the confirmation is sent. the name and telephone number of the Service Provider contact. the date and time of the requested service change. the account number involved in the request. and a code for the reason that the old Service Provider cannot meet the service change request:

- Hunt Group Section gives information needed when the directory number involved in the service change is pan of a hunt group;

- DID Section gives information needed when the directory number involved in the service change is a DID number;

- Circuit Detail Section includes information regarding actual circuit and porting information for each line involved in the service chanpe:

- SECLOC Section identifies. for each line. related circuit and connection information:

- Directory Section is used in response to a Directory Service Request (DSR) and gives information regarding the type of response being returned to the new Service Provider, the account number, the company code. names and numbers of company contacts, and billing account numbers:

- Remarks Section provides a free-form section for any additional information.

4.1.3 Analysis of Wireline LSR forms

After reviewing these four forms in detail. it became evident that wireless carriers would be unable to populate all of the data elements. Wireline Service Providers had initially used these forms for ordering unbundled services and the forms included information that is cirher not relevant to LNP or is specific to wireline services. As a result. the CTIA Inter-Service Provider Sub-committee, and subsequently the WWISC. agreed to propose an integration of wireless requirements into the existing wireline LSR process. Relevant data elements that could be populated within the four forms by wireless Service Providers for all port scenarios were identified.

4.1.4 OBF Issue #1732

In order to begin the integration process. an OBF Issue document and supporting WWISC liaison letter were presented by two wireless carriers to the Ordering and Provisioning Committee (O&P) at OBF #63 in August. The issue was accepted by the O&P committee as Issue #1732 and a Task Force was formed to review the data elements for use and content, and recommend changes where needed. The Task Force met in September and reviewed each data element in the four forms. As a result, changes to the existing guideline documentation and the addition of a Wireless Service Indicator were recommended. These results were presented to WWISC in October and to the full O&P committee at OBF #64 in November.

4.1.5 Additional LSR Forms

Other OBF forms are being utilized or are under design by the wireline industry for LNP that wireless may need to consider. These forms will be used for pre-order (e.g. Customer Information Request, Service Configuration Request and Loss Alert forms), completion notification and loss alert.

4.2 Holidays, Business Days, and Hours of Operation

The purpose of this section of the document is to present the industry agreement on

holidays, business days, and hours of operation for wireless and wireline carriers conducting number porting. It should be noted that the NPAC timers do not run and carriers are not expected to process information outside of the normal business hours of operations.

4.2.1 Holidays

The following table provides a list of Holidays that have been agreed upon by the wireless and wireline industries and contractually with Lockheed Martin. These holidays apply to all NPAC/ SMS time-dependent operations. (Please note that Canadian Holidays are not included nor are local regional Holidays).

Holiday	Calendar Date
New Years Day	January 1
Martin Luther King Day	Third Monday in January
President's Day	Third Monday in February
Memorial Day	The last Monday in May
Independence Day	July 4th
Labor Day	The first Monday in September
Columbus Day	The second Monday in October
Thanksgiving Day (US)	The last Thursday in November
Day after Thanksgiving (US)	Day after Thanksgiving
Christmas Eve	December 24th
Christmas Day	December 25th

4.2.2 Business Days and Hours of Operation for the NPAC/SMS Timers

All NPAC regions are currently operating on the wireline model for business hours. Wireless Number Portability will include new hours of operations for wireless carriers to reflect their business model and incorporate the hours of their retail operations. These hours are designed to allow for a buffer between the acceptance of a "request" by a customer to port their number" and the close of business of retail outlets. Although many wireless carriers operate 24 hours a day, 7 days a week, the following table reflects the hours that have been agreed to by the industry.

Table 2: Normal Hours of Operation **		
	Wireline *	**Wireless** *
Sunday		
Monday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Tuesday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Wednesday	7AM TO 7PM CT	8 or 9 am 12 hr duration

Thursday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Friday	7AM TO 7PM CT	8 or 9 am 12 hr duration
Saturday		8 or 9 am 12 hr duration

"Local time to he determined by region

**Support outside normal business hours is provided by the NPAC

The NPAC timers run during the hours *for* operauons stated in Table 2. Wircless camers may process ports in the NPAC (create subscnpiions, etc.) outside of the hours of operation. However. the timers do not run.

Wireless camers may also process LSRs/FOCs outside of days and hours of operation stated in Tables 1 and 2. However, carriers are not required to respond or process LSR/FOCs outside *of* the normal business hours of operarion. (Business hours for processing information coincide with business hours of operation stated in Tables 1 and 2).

Table 3 provides a matrix of both the (wireline) long timers and the (wireless) short timers available in the NPAC/SMS.